

To: Vincent Cogliano[Ex. 6 - Personal Privacy]; Sayles, Gregory[Sayles.Gregory@epa.gov]; Vandenberg, John[Vandenberg.John@epa.gov]; Sams, Reeder[Sams.Reeder@epa.gov]; Jarabek, Annie[Jarabek.Annie@epa.gov]
Cc: Cogliano, Vincent[cogliano.vincent@epa.gov]
From: Kavlock, Robert
Sent: Sun 1/26/2014 10:58:49 PM
Subject: Re: Toxicology Information to support evaluation of PPh Basic

Vince

Just noticed I do not have the attachments. Can someone get them to my epa account as well as to [Ex. 6 - Personal Privacy]. Thanks

From: Vincent Cogliano[Ex. 6 - Personal Privacy]
Sent: Sunday, January 26, 2014 4:20:18 PM
To: Sayles, Gregory; Kavlock, Robert; Vandenberg, John; Sams, Reeder; Jarabek, Annie
Cc: Cogliano, Vincent
Subject: Re: Toxicology Information to support evaluation of PPh Basic

Hello everyone -- I'm not the EPA's best scientific reviewer of these reports. It would be better if they were reviewed by scientists with expertise in the glycol ethers.

Ex. 5 - Deliberative

To: Vincent Cogliano[Ex. 6 - Personal Privacy]; Sayles, Gregory[Sayles.Gregory@epa.gov]; Vandenberg, John[Vandenberg.John@epa.gov]; Sams, Reeder[Sams.Reeder@epa.gov]; Jarabek, Annie[Jarabek.Annie@epa.gov]
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Hello everyone -- I'm not the EPA's best scientific reviewer of these reports. It would be better if they were reviewed by scientists with expertise in the glycol ethers.

What I can do is express concern that the authors of these reports are either not disclosed or do not seem to have much expertise in the glycol ethers, either. I started with the ECETOC report -- characterized by Dow as a "go-to" reference. I did a PubMed search on each author with only the term "glycol ether" added to the author's name. Fourteen of the 16 authors had no publications on a glycol ether, R Boatman had four, and P Spencer had 3. Then I did a PubMed search on each of the 16 peer reviewers. None had a single publication on a glycol ether. This is a very weak peer review, made even weaker because the peer reviewers are largely affiliated with the same chemical companies that form ECETOC. (Don't be fooled into thinking that ECETOC is affiliated with the European Commission. Despite beginning their name with "European Centre," having their headquarters in Brussels, and using European Commission terms like Secretary General, they are comprised of companies and organizations in the chemical industry.)

None of the other three reports include information about the identity or expertise of the authors or peer reviewers. In view of the lack of glycol ether expertise for the "go-to" ECETOC report, this raises a concern. I would also note that the reports on Glycol ethers P-series category and on Justification for read-across are poorly referenced.

Tables 2 and 3 of the ECETOC report seem to indicate a large number of positive results, including for testicular toxicity, reproductive toxicity, and developmental toxicity, and very few studies of carcinogenicity. ECETOC characterizes these compounds as combining characteristics of ethers and alcohols, which makes it rather surprising to conclude that long-term exposure does not lead to more severe or different effects. I could note that chronic alcohol drinking causes several effects different from short-term alcohol exposure. When ECETOC discusses cancer, they mention repeated-dose oral and inhalation studies that result in irritation that progressed to hyperplasia and forestomach tumors after prolonged exposure. They also dismiss the kidney

tumors as associated with [Ex. 6 - Personal Privacy] reference to the 1999 IARC criteria.

I'm sending these thoughts only to the ORD addressees in view of Bob Kavlock's preference to review comments before they go beyond ORD. If you find these comments helpful, please send them quickly to Becki and the others (and copy me, please).

Thanks,
Vince

On 26 Jan 2014, at 9:45 AM, [Ex. 6 - Personal Privacy], "Cogliano, Vincent" <cogliano.vincent@epa.gov> wrote:

[Ex. 6 - Personal Privacy]

From: Sayles, Gregory

Sent: Saturday, January 25, 2014 4:52:19 PM

To: Cogliano, Vincent

Cc: Vandenberg, John; Kavlock, Robert; Sams, Reeder; Jarabek, Annie; Clark, Becki

Subject: Fw: Toxicology Information to support evaluation of PPh Basic

Vince - please see Becki's note and please review the attached materials NIEHS sent so we can be prepared to help out. I hope you have time to do this on the weekend - please advise.

Ex. 5 - Deliberative

tumors as associated with alpha-2u globulin without reference to the 1999 IARC criteria.

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Vince - please see Becki's note and please review the attached materials NIEHS sent so we can be prepared to help out. I hope you have time to do this on the weekend - please advise. If you have any immediate thoughts to share, please do.

Thanks much.
Greg

From: Clark, Becki
Sent: Saturday, January 25, 2014 4:23:07 PM
To: Burneson, Eric; Doyle, Elizabeth; Grevatt, Peter
Cc: Sayles, Gregory; Capacasa, Jon; Vandenberg, John; Cogliano, Vincent
Subject: Fw: Toxicology Information to support evaluation of PPh Basic

Everyone,
I am forwarding you data on the toxicity of the glycol ethers that were released during the West Virginia spill. NIEHS received this info from Dow Chemical, and they are working with CDC to evaluate it now. I expect ATSDR may make a statement and/or issue an updated health advisory after the new information has been evaluated. It's a lot of information, but I think OW, ORD and R3 folks will need to look at it this weekend so we know what's there and can be ready to assist and review any updated health advisory. Please share with others in your organizations as appropriate, and let me know your thoughts on this. Thanks.

From: Weis, Christopher (NIH/NIEHS) [E] <christopher.weis@nih.gov>
Sent: Saturday, January 25, 2014 3:56:30 PM
To: Clark, Becki; Sayles, Gregory

Ex. 5 - Deliberative

Chris

Christopher P Weis, Ph.D., DABT.
Toxicology Liaison / Senior Advisor
Office of the Director
National Institute of Environmental Health Science
National Institutes of Health
Bethesda, MD
Tel: 301.496.3511

From: **Ex. 4 - CBI**
Sent: Saturday, January 25, 2014 12:39 PM
To: Weis, Christopher (NIH/NIEHS) [E]
Cc: Deford, Connie (CL); Kay, Michael (MT)
Subject: Toxicology Information to support evaluation of PPh Basic

Hi Dr. Weis,

Dow is providing the following toxicological information to help assist in the risk characterization of PPh Basic in reference to the ongoing situation in West Virginia. I hope that it will provide you with the added background information and further detail you need to complete your assessment.

The first document is the ECETOC Report on Glycol Ethers. It is a very comprehensive review of data on the family of glycols ethers and how structural similarities of the two categories (the ethylene and propylene series) impart similar toxicity profiles. It is a good "go to" reference to help understand the rationale for using data from specific members in the category as read across to others.

The second document is a more detailed scientific rationale for using a category approach for the propylene glycol ethers series. The third document outlines the scientific justification for reading across from the ethylene glycol phenyl ether to the di-ethylene glycol phenyl ether, for the repeated-dose and developmental endpoints specifically.

Together the above reference materials, I hope, will provide you with a good foundation to better understand the structural similarity of the glycol ether class, its influence on the overall toxicity profiles and its application in using propylene glycol phenyl ether data to predict the toxicological profile for the di-propylene glycol phenyl ether.

Finally is a copy of the Chemical Safety Report (CSR) for propylene glycol phenyl ether

Subject: FW: Toxicology Information to support evaluation of PPh Basic

Becki,

As discussed, attached is information from Dow regarding glycol ethers.

Chris

Christopher P Weis, Ph.D., DABT.
Toxicology Liaison / Senior Advisor
Office of the Director
National Institute of Environmental Health Science
National Institutes of Health
Bethesda, MD
Tel: 301.496.3511

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(PPh) created in compliance with the requirements under the EU REACH registration. The report contains supported uses, the key toxicological studies, the critical NOAEL, DNELs and output from relevant exposure scenarios that were modeled for supported product uses.

I hope that the above information provides the level of detail needed to help advance your efforts. Please feel free to contact me with any questions or for any additional information that you require.

Best regards,

Ex. 4 - CBI

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<ECETOC TR 095 Vol I[1].pdf><Glycol ether P-series Chemical Category_Final_March 2013.docx><Justification for Read across between EPh and Di-EPh.pdf><Dow_Final CSR complete_PPh_070910.pdf>

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